

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BARRACK RODOS & BACINE,

Plaintiff,

v.

BALLON STOLL BADER AND NADLER, P.C.,

Defendant.

Civil Action No. 08 CV 02152 (PKL)

**MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, William J. Ban, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission *pro hac vice* of Daniel E. Bacine of Barrack, Rodos & Bacine, 3300 Two Commerce Square, 2001 Market Street, Philadelphia, PA 19103, Telephone: (215) 963-0600, Fax: (215) 963-0838.

Daniel E. Bacine is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania. There are no pending disciplinary proceeding against Daniel E. Bacine in any state or federal court.

Dated: March 10, 2008
New York, New York

Respectfully submitted,

BARRACK RODOS & BACINE

By: 

William J. Ban (WB0382)
1350 Broadway
Suite 1001
New York, NY 10018
(212) 688-0782
Fax: (212) 688-0783
Email: wban@barrack.com

Attorney for Plaintiff

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**DECLARATION OF WILLIAM J. BAN IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, William J. Ban, declare under penalty of perjury, that the foregoing is true and correct to the best of my knowledge:

1. I am an attorney at the law firm of Barrack, Rodos & Bacine and counsel for plaintiff in the above-captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Daniel E. Bacine *pro hac vice* to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on June 20, 1983. I was admitted to the bar of the United States District Court for the Southern District of New York in July 1983 and am in good standing with this Court.

3. I have known Daniel E. Bacine for more than ten years and have worked with him continuously at Barrack, Rodos & Bacine since April 2004.

4. Mr. Bacine is a partner at Barrack, Rodos & Bacine at the firm's main office in Philadelphia, Pennsylvania and is duly admitted to practice in the Commonwealth of Pennsylvania and in the United States District Court for the Eastern District of Pennsylvania.

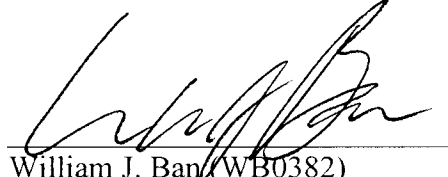
5. Attached hereto as Exhibits 1 and 2, respectively, are current certificates of good standing for Mr. Bacine issued by the Supreme Court of the Commonwealth of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania.

6. I have found Mr. Bacine to be a skilled attorney of fine character and integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

7. Accordingly, I am pleased to move the admission *pro hac vice* of Daniel E. Bacine.

WHEREFORE, I respectfully request that the Court grant the motion to admit *pro hac vice* of Daniel E. Bacine as counsel for the plaintiff in the above-captioned matter.

Dated: March 10, 2008



William J. Ban (WB0382)
BARRACK, RODOS & BACINE
1350 Broadway
Suite 1001
New York, NY 10018
(212) 688-0782
Fax: (212) 688-0783
Email: wban@barrack.com

Attorney for Plaintiff



Supreme Court of Pennsylvania

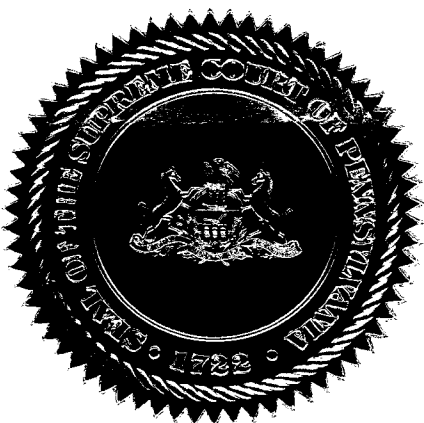
CERTIFICATE OF GOOD STANDING

Daniel E. Bacine, Esq.

DATE OF ADMISSION

November 1, 1971

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: March 10, 2008

A handwritten signature in ink, appearing to be "John W. Person, Jr.", written over a horizontal line.

John W. Person, Jr., Esq.
Deputy Prothonotary

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA



I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Daniel E. Bacine , Bar # 16742, was duly admitted to practice in said Court on October 11, 1973 , and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on March 10, 2008 .

BY


Aida Ayala, Deputy Clerk

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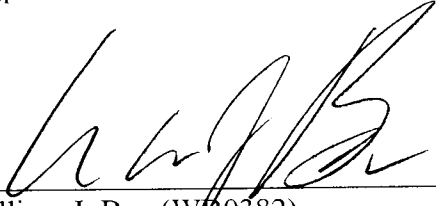
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CERTIFICATE OF SERVICE

I, William J. Ban, a member of the bar of this Court, hereby certify that true and correct copies of the foregoing Motion to Admit Counsel *Pro Hac Vice*, the supporting Declaration of William J. Ban and Proposed Order, have been filed this 10th day of March, 2008, with the Clerk of the Court and copies have been served, via first-class mail, on counsel for defendant, addressed as follows:

Susan Schneiderman, Esquire
Ballon Stoll Bader & Nadler, P.C.
1450 Broadway, 14th Floor
New York, NY 10018

Dated: March 10, 2008



William J. Ban (WB0382)
BARRACK, RODOS & BACINE
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Suite 1001
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**PROPOSED ORDER FOR
ADMISSION PRO HAC VICE**

Upon the motion of William J. Ban, counsel for plaintiff in the above-captioned case, and his affidavit in support thereof;

IT IS HEREBY ORDERED that

Daniel E. Bacine
Barrack, Rodos & Bacine
3300 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-0600
Fax: (215) 963-0838
Email: dbacine@barrack.com

is admitted to practice *pro hac vice* as counsel for plaintiff in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel has paid the pro hac vice fee to the Clerk of Court.

Dated: _____, 2008

United States District/Magistrate Judge